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Shealy Boland Reibold Counsel for ORS

February 4, 2011

## VIA ELECTRONIC FILING

Jocelyn Boyd, Esquire Chief Clerk/Administrator South Carolina Public Service Commission 101 Executive Center Dr., Suite 100 Columbia, SC 29210

Re: Rulemaking Regarding Information to Be Filed with Financing Applications

Docket No. 2010-402-E

Dear Ms. Boyd:

On December 13, 2010, the Commission filed a notice of drafting with the South Carolina Legislative Council regarding a new regulation that will reflect the requirements set forth in Order No. 1991-72 in Docket No. 1991-32-E. Interested persons were given until February 4, 2011 to provide comments.

Attached please find joint proposed language from the Office of Regulatory Staff, Duke Energy Carolinas, Progress Energy Carolinas, and South Carolina Electric and Gas. The parties appreciate the opportunity to comment.

Sincerely,

Shealy Boland Reibold

Shealy Boland Reibold

cc: Len S. Anthony, Esquire Charles A. Castle, Esquire K. Chad Burgess, Esquire

Matthew W. Gissendanner, Esquire

## S.C. Code Regs. 103-\_\_\_ Financing Applications

Any electrical utility filing financing applications must provide the following information as a separate part of its application:

- a. Identify the effect of the proposed financing on the utility's income statement, balance sheet and capital structure;
- b. Identify specifically how the funds obtained through the proposed financing are to be used by the utility;
- c. Provide information on the possible impact on the utility if the proposed financing is not approved or if approval is delayed;
- d. Using current market conditions, specify the expected rate of interest of any proposed debt financing. For common stock issues, provide information on the anticipated market price and book value per share at the time of issue;
- e. Provide information on the expected benefits (e.g., savings expected from early debt retirement) and costs (e.g., issuance expenses, fees, discounts, and markups) of the proposed financing, including any studies developed to identify the costs and benefits and the net result of the proposed financing (which may incorporate present value analysis of the costs and benefits) and the basic assumptions of any analyses of costs and benefits;